

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

JANE DOE

Plaintiff,

v.

AR, MICHAEL S. RUSSELL, ANDREA T. RUSSELL,
MJN, ROBERT G. NOVITSKY, ALICIA M.
NOVITSKY a/k/a ALICIA JEAN, TJH, TIMOTHY J.
HAY, SHANNON M. HAY, BA, LOUIS B.
APPLEBAUM, and JULIE D. APPLEBAUM,

Defendants.

**STIPULATION
AND ORDER TO
SEAL**

Case No.: 6:21-cv-06353
(FPG) (MWP)

WHEREAS, Plaintiff Jane Doe brought this action under a pseudonym and, to date,
no party has opposed; and

WHEREAS, certain allegations in the complaint are alleged to have occurred when
certain defendants (“Minor Defendants”) were between the ages of thirteen and fifteen; and

WHEREAS, one of the Minor Defendants’ name is used in paragraph 35 of the
Amended Complaint; and

WHEREAS, the complaint names the Minor Defendants under pseudonyms to
protect their identities; and

WHEREAS, certain allegations in the complaint are alleged against the Minor
Defendants’ parents (“Parent Defendants”);

WHEREAS, the parties and their counsel (“Parties”), having taken into
consideration the public interest and public policy factors associated with proceeding under

pseudonyms in this action, and for good cause, stipulate and agree, subject to approval by the Court, as follows:

1. Allowing the Parent Defendants to proceed under pseudonyms; and
2. The Court shall issue an order instructing the clerk of the Court to redact all of the defendants' names from this Order and all previous filings.

Dated: Rochester, New York
January 18, 2023

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SO ORDERED:

HONORABLE MARIAN W. PAYSON
United States Magistrate Judge

Dated: Rochester, New York
January __, 2023